

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION AT COLUMBUS

In re)	Chapter 7
)	
JOHN ERIC OREM JR. AND)	Case No. 21-51802
SEERINA LOUISE OREM,)	
Debtors.)	Judge Preston
_____)	

**MOTION OF UNITED STATES TRUSTEE FOR ORDER DIRECTING
DEBTORS TO APPEAR FOR FED. R. BANKR. P. 2004 EXAMINATION AND
PRODUCE DOCUMENTS**

Andrew R. Vara, United States Trustee for Regions 3 and 9, pursuant to FED.R.BANKR.P. 2004(a), requests this Court enter an order directing Debtors to appear on August 25, 2021, at 10:00 a.m. to be examined under oath with respect to issues pertaining to Debtors' assets, debts, and financial affairs for the reasons set forth in the attached Memorandum. The United States Trustee further requests production of documents to be produced on or before August 18, 2021.

WHEREFORE, the United States Trustee requests an Order directing Debtors to appear for a FED.R.BANKR.P. 2004 Examination on August 25, 2021. The Examination will be conducted via Microsoft Teams and a link will be provided upon entry of the Order.

Pursuant to General Order #12-4, Notice pursuant to LBR 9013-1(a) is not required.

Dated: July 29, 2021

ANDREW R. VARA
UNITED STATES TRUSTEE FOR REGIONS 3 and 9

/s/ Pamela Arndt
Pamela Arndt (0068230)
U.S. Department of Justice, U.S. Trustee Program
170 North High Street, Suite 200
Columbus, OH 43215
Telephone: (614) 469-7411 ext. 228
Facsimile: (614) 469-7448
Email: Pamela.D.Arndt@usdoj.gov

MEMORANDUM OF LAW

FED.R.BANKR.P. 2004 provides in relevant part that “on motion of a party in interest, the court may order the examination of any entity ”relating to the “acts, conduct, or property or to the liabilities and financial condition of the debtor, or to any matter which may affect the administration of the debtor’s estate, or to the debtor’s right to a discharge.”

An examination of Debtors is necessary in this case to investigate Debtors’ assets, debts, and financial affairs. Concerns over Debtors’ actions in this case arise from Debtors’ attempted sale of real estate to insiders during the pendency of their bankruptcy case. An examination is necessary, along with an order to produce the requested documents, so that the U.S. Trustee can complete his investigation and ascertain whether seeking dismissal of Debtors case, or an objection to discharge, is appropriate. The requested documents are:

Any and all documents related to the attempted sale of real estate located at 7922 Third Street, Orient, OH 43146, including, but not limited to the real estate agent listing agreement/contract, purchase agreement, deed, and/or settlement statement (if any).

In order to ensure a meaningful Examination, the U.S. Trustee requests these documents be produced one week prior to the Examination, on August 18, 2021, to allow adequate time to review and prepare.

WHEREFORE, the United States Trustee prays that pursuant to FED.R.BANKR.P. 2004, Debtors be Ordered to appear and submit to examination under oath at the time and place stated herein, to produce requested documentation, and for such other relief as is just and proper.

Dated: July 29, 2021

ANDREW R. VARA
UNITED STATES TRUSTEE FOR REGIONS 3 and 9

/s/ Pamela Arndt
Pamela Arndt (0068230)
U.S. Department of Justice, U.S. Trustee Program
170 North High Street, Suite 200
Columbus, OH 43215
Telephone: (614) 469-7411 ext. 228
Facsimile: (614) 469-7448
Email: Pamela.D.Arndt@usdoj.gov

CERTIFICATE OF SERVICE

I hereby certify that on July 29, 2021, a copy of the foregoing MOTION OF UNITED STATES TRUSTEE FOR ORDER DIRECTING DEBTORS TO APPEAR FOR FED. R. BANKR. P. 2004 EXAMINATION AND PRODUCE DOCUMENTS was served (i) electronically on the date of filing through the court's ECF System on all ECF participants registered in this case at the email address registered with the court and (ii) on the following by ordinary U.S. Mail addressed to:

John Eric Orem, Jr.
99 Canterbury Court
London, OH 43140

Seerina Louise Oren
190 Ranelle Drive
Columbus, OH 43204

Richard A. Schwager, Esq.
555 S. Third Street
Columbus, OH 43215

Synchrony Bank
c/o PRA Receivables Management, LLC
PO Box 41021
Norfolk, VA 23541

/s/ Pamela Arndt
Pamela Arndt